

**UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO**

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

NO. 17-BK-3283 (LTS)

As representative of

PROMESA TITLE III

THE COMMONWEALTH OF PUERTO RICO,
et al.,
Debtors.

(Jointly Administered)

**NOTICE OF RE APPEARANCE OF COUNSEL ON BEHALF OF PLAINTIFFS' CLASS
TO ENFORCE TERMS OF STIPULATION**

TO THE HONORABLE U.S. DISTRICT COURT JUDGE LAURA TAYLOR SWAIN:

COMES NOW the certified Plaintiffs' Class in case Gladys García Rubiera, etc., v. Hon. Luis G. Fortuño, et al, Civil No. 02-1179 (GAG) represented by the authorized counsel and respectfully prays as follows:

1. After this Honorable Court approved a Stipulation whereby the defendant Commonwealth of Puerto Rico adopted the terms of the stipulation entered into between the Certified Class and defendant the Commonwealth of Puerto Rico of February 29, 2016 (Dkt. 446) in case Gladys García Rubiera etc., v. Hon. Luis G Fortuño, et al, Civil No. 02-1179 (GA), the undersigned counsel withdrew its appearance and requested a cease of service of notices, order, pleadings and documents. (*See*, Dkt. 17958), since we believed that no further intervention from this Honorable Court was necessary, and that Plaintiffs' Class would obtain an adequate remedy.

2. Although numerous members of the Class applied for a remedy in terms of applications for reimbursement, totaling 88,000 individual claims, they have yet to receive the remedy as Defendant maintains that Plaintiffs' Class members have not provided new requirements unilaterally added by Defendant, which were not contemplated in the Stipulation.

3. In spite of the fact that the undersigned counsel sent to Defendant draft of the proposed Motion to Compel that the intended to file to cure Defendant's default, no answer has been received, making it necessary to litigate this issued before this Honorable Court.

4. Therefore, it is necessary to enter again our appearance as counsel for the Plaintiffs' Class and request to be notified of all proceedings of the case, in accordance with the rules and procedures established by this Honorable Court.

WHEREFORE, it is respectfully requested that this motion be granted, and counsel be allowed to again appear as counsel for the certified Plaintiffs' Class and be notified of all proceedings.

A Proposed Order is herein submitted. A Motion to Compel Enforcement and Memorandum in Support are filed accordingly.

RESPECTFULLY SUBMITTED

CERTIFICATE OF SERVICE

I hereby certify that, on July 21, 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record and parties in the Master Service List.

In San Juan, Puerto Rico, July 21, 2022.

s/Antonio J. Amadeo Murga
USDC-PR No. 110103
A.J. AMADEO MURGA LAW OFFICES
605 Condado, Ave.
Suite 518
San Juan, PR 00907
Tel. (787)764-0893
ajamadeo@gmail.com